

# **EXHIBIT 8**

## **PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON ISSUES OF INFRINGEMENT AND DEFENDANTS' INVALIDITY DEFENSES**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

SIGNIFY NORTH AMERICA	:	
CORPORATION and SIGNIFY HOLDING	:	
B.V.,	:	
Plaintiffs,	:	CIVIL ACTION FILE
versus	:	NUMBER:
	:	2:22-cv-2095
LEPRO INNOVATION INC., LE	:	
INNOVATION INC., INNOVATION	:	
RULES INC., HOME EVER INC., and	:	
LETIANLIGHTING, INC.,	:	
Defendants.	:	

VIDEOTAPED DEPOSITION OF  
JOHN W. CURRAN, PH.D.

## Volume II

9:14 a.m.  
October 16, 2024

REGUS BUSINESS CENTER  
100 Bull Street  
Second Floor  
Savannah, Georgia

Job No.: 556581  
Pages: 246 - 487

Stenographically Reported By:  
Susan DiFilippantonio, RPR, RMR, California CSR 14383

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Aaron Rugh, in-house counsel Signify  
21 Gary Yen, in-house counsel Signify  
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17	fluorescent lamps with high-brightness LEDs	
18	in a bridge lighting application	
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1 (Wednesday, October 16, 2024 9:14 a.m.) 09:15:07

2 TECHNICIAN: Please stand by for the 09:13:31

3 technician read-on and backup recording. Zoom will 09:13:33

4 now prompt you for your consent to video-record 09:13:35

5 this meeting for backup purposes. 09:13:38

6 Thank you to everyone for attending this 09:13:41

7 proceeding remotely, which we anticipate will run 09:13:42

8 smoothly. Please remember to speak slowly and do 09:13:45

9 your best not to talk over one another. Please be 09:13:48

10 aware that we are recording this proceeding for 09:13:50

11 backup purposes. Any off-the-record discussions 09:13:53

12 should be had away from the computer. Please 09:13:56

13 remember to mute your mic for those conversations. 09:13:59

14 Please have your video enabled to help the reporter 09:14:02

15 identify who is speaking. If you are unable to 09:14:05

16 connect with video and are connecting via phone, 09:14:08

17 please identify yourself each time before speaking. 09:14:10

18 I apologize in advance for any technical-related 09:14:13

19 interruptions. Thank you. 09:14:16

20 THE VIDEOGRAPHER: All right. Please 09:14:21

21 stand by for video. 09:14:23

22 Here begins Media Number 1 in the 09:14:39

23 continued videotaped deposition of John W. Curran, 09:14:41

24 Ph.D., in the matter of Signify North America 09:14:46

25 Cooperation, et al., v. Lepro Innovations, Inc., et 09:14:48

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1	al., in the United States District Court for the	09:14:52
2	District of Nevada, Case Number 2:22-CV-02095.	09:14:54
3	Today's date is October 16th, 2024, and the time on	09:15:01
4	the video monitor is 9:14 a.m. Videographer today	09:15:04
5	is Matthew Simpson, representing Planet Depos.	09:15:09
6	This video deposition is taking place at 22 Bull	09:15:11
7	Street, Third Floor, Savannah, Georgia 31401.	09:15:15
8	Would counsel please voice-identify	09:15:18
9	themselves and state whom they represent.	09:15:20
10	MR. SWAIN: Hello and good morning. This	09:15:22
11	is Adam Swain from the law firm of Alston & Bird on	09:15:24
12	behalf of the Signify plaintiffs.	09:15:28
13	With me, as well, is Mr. Jeremy Oczek,	09:15:29
14	Mr. Jonathan Gray -- that's the American, not the	09:15:34
15	British spelling -- of the Bond Schoeneck firm, as	09:15:35
16	well as in-house counsel, Mr. Aaron Rugh.	09:15:37
17	MR. CHEN: Good morning. This is Hua	09:15:40
18	Chen from the law firm of ScienBiziP, PC, hereby	09:15:42
19	representing the Lepro defendants.	09:15:47
20	THE VIDEOGRAPHER: The Court Reporter	09:15:49
21	today is Susan DiFilippantonio, representing Planet	09:15:50
22	Depos. The witness will now be sworn.	09:15:54
23	JOHN W. CURRAN, PH.D.,	
24	called as a witness at the instance of the Plaintiffs,	
25	being first duly sworn, was examined and deposed as	

## Transcript of John W. Curran, Ph.D. - Volume 2

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1	I'm on the signature page.	15:37:41
2	BY MR. OCZEK:	15:37:43
3	Q. Okay. And is that your signature on the	15:37:43
4	signature page?	15:37:45
5	A. Yes.	15:37:46
6	Q. And that was signed on August 19, 2024?	15:37:46
7	A. It was signed on whatever date -- yeah, if it's	15:37:50
8	signed and that's the date on it, that's the date it was	15:37:56
9	signed.	15:37:58
10	Q. Okay. On that same page, sir, look at paragraph	15:37:59
11	84 in the heading above that which says the '399 and	15:38:05
12	'138 patent Dr. Zane's expert report. Do you see that?	15:38:11
13	A. Yes.	15:38:15
14	Q. And then paragraph 84 says I was asked to not	15:38:16
15	spend any time responding to Dr. Zane's expert report	15:38:20
16	regarding the '138 and '399 patent, thus I'm not	15:38:24
17	providing any opinions here in response to that report.	15:38:29
18	Do you see that, sir?	15:38:32
19	A. Yes.	15:38:33
20	Q. Okay. You agree that you have not provided any	15:38:33
21	opinions in this case regarding infringement or	15:38:37
22	noninfringement of Defendants' accused products for the	15:38:43
23	'138 and '399 patents, correct?	15:38:48
24	A. Correct.	15:38:53
25	Q. Okay. You had the opportunity to do so with	15:38:54

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401

1 this report but you did not include any opinions with 15:38:57  
2 respect to infringement or noninfringement of the '138, 15:39:03  
3 '399 patents, correct? 15:39:07

4 A. Correct. 15:39:08

5 Q. And as you sit here today, sir, at your 15:39:09  
6 deposition on October 16th, 2024, you have no opinions 15:39:14  
7 with respect to infringement or noninfringement of the 15:39:19  
8 Defendants' accused products for the '138 and '399 15:39:23  
9 patents, correct? 15:39:27

10 A. Yes, correct. 15:39:30

11 Q. Okay. Now, I'd like to introduce for you two of 15:39:31  
12 the exhibits to Dr. Zane's report. So Exhibit 17 should 15:39:43  
13 be Exhibit C to his report. 15:39:55

14 (Plaintiffs' Exhibit 17, Expert Report of 15:39:59  
15 Dr. Regan Zane, Exhibit C, was marked for  
16 identification.)

17 (Plaintiffs' Exhibit 18, Expert Report of 15:40:00  
18 Dr. Regan Zane, Exhibit D, was marked for  
19 identification.) 15:40:00

20 BY MR. OCZEK: 15:40:00

21 Q. And Exhibit 18 should be Exhibit D to the Zane 15:40:01  
22 report. Have you -- let me start with Exhibit C. Have 15:40:08  
23 you seen this document before which -- I'm sorry, 15:40:38  
24 Exhibit C to the Zane report which is Exhibit 17 for 15:40:42  
25 today's deposition. 15:40:47

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402

1 A. I'm sorry, what was the -- I lost track. What 15:42:34  
2 was the question? 15:43:15

3 Q. Actually I didn't ask a question. We were just 15:43:17  
4 introducing the exhibit. 15:43:20

5 A. Oh, okay, all right. 15:43:21

6 Q. But you've had an opportunity to go through this 15:43:22  
7 exhibit? 15:43:25

8 A. I -- in terms of scrolling through it now, I 15:43:25  
9 think I hit it all. 15:43:29

10 Q. Okay. And have you seen this document before, 15:43:31  
11 sir? 15:43:33

12 A. I might have. I apologize but I can't say for 15:43:33  
13 sure really one way or the other. I'm looking for 15:43:59  
14 something that -- picture -- which one -- page one, page 15:44:04  
15 two. The picture on page two looks familiar, the light 15:44:17  
16 bulb with the lens pulled off. There was a couple of 15:44:23  
17 pictures with the lenses pulled off. I'm sorry, the 15:44:37  
18 best I can do is that I may have seen it, the pictures 15:45:06  
19 -- except for the -- the A19s with the lens removed are 15:45:11  
20 the only ones that look familiar to me. 15:45:20

21 Q. Okay. I'll represent to you, sir, that this 15:45:26  
22 Exhibit Z [sic] to Dr. Zane's reported which is 15:45:30  
23 Exhibit 17 for this deposition, this is Dr. Zane's 15:45:34  
24 infringement claim charts for the '399 patent, the 15:45:40  
25 asserted claims of that patent. Okay? 15:45:45

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1	A.	Okay.	15:45:49
2	Q.	All right. And I believe the entire document is	15:45:49
3		156 pages and Dr. Zane goes in detail methodically	15:45:55
4		through each element of each asserted claim. And my	15:46:07
5		question to you, sir, is you don't have any opinions to	15:46:10
6		rebut Dr. Zane's element-by-element analysis that each	15:46:14
7		of the asserted claims infringes the accused products of	15:46:22
8		the '399 patent, correct?	15:46:28
9	A.	I wasn't asked to form an opinion.	15:46:34
10	Q.	So, therefore, you have no opinions, correct?	15:46:38
11	A.	Yes, I didn't spend any time forming an opinion.	15:46:42
12	Q.	All right. So you don't -- as you sit here	15:46:53
13		today, you haven't issued any opinions that rebut what	15:47:00
14		Dr. Zane has set forth in this Exhibit C, correct?	15:47:05
15	A.	Correct.	15:47:11
16	Q.	And you had the opportunity to do that in your	15:47:11
17		August 19th report, but you were not asked to do so,	15:47:16
18		correct?	15:47:20
19	A.	Correct.	15:47:21
20	Q.	All right. I'm going to ask you the same set of	15:47:21
21		questions on the next exhibit, which is Exhibit 18. And	15:47:27
22		this is Exhibit D to Dr. Zane's report. And I'll give	15:47:32
23		you the opportunity to look at that document. And I'll	15:47:38
24		ask the same question, which is are you familiar with	15:47:43
25		this document?	15:47:46

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1 A. Going through it, it looks to me very similar to 15:48:30  
2 Exhibit C and once again I had the same response a 15:48:36  
3 couple -- the A19 pictures I may or may not have seen, 15:48:41  
4 but I can't say for sure one way or the other if I've 15:48:47  
5 seen this document. 15:48:53

6 Q. Okay. I'll represent to you that Exhibit 17 -- 15:48:54  
7 sorry, strike that -- I'll represent to you, sir, that 15:48:59  
8 Exhibit 18 is Dr. Zane's infringement claim charts for 15:49:02  
9 the '138 patent for the asserted claims of this patent, 15:49:10  
10 okay? 15:49:14

11 A. Okay. 15:49:15

12 Q. All right. And I believe this document is 15:49:16  
13 93 pages long. And in this Dr. Zane goes into detail 15:49:24  
14 methodically through each element of each asserted claim 15:49:30  
15 of the '138 patent and my question to you, sir, is you 15:49:33  
16 don't have any opinions to rebut Dr. Zane's 15:49:37  
17 element-by-element analysis that each of the asserted 15:49:44  
18 claim infringes the accused products of the '138 patent, 15:49:47  
19 correct? 15:49:52

20 A. I wasn't asked to form an opinion, so I have not 15:49:54  
21 formed an opinion. 15:49:58

22 Q. And so, therefore, you have no opinion, correct? 15:50:01

23 A. Yes, I've formed no opinion. 15:50:10

24 Q. Okay. And just to confirm as you sit here today 15:50:13  
25 you haven't issued any opinions that rebut what Dr. Zane 15:50:16

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1 has set forth in this Exhibit D to his expert report, 15:50:22  
2 correct? 15:50:28

3 A. Yes, if I had -- I have not formed an opinion, 15:50:28  
4 so I haven't issued any opinions. 15:50:32

5 Q. Okay. And you had the opportunity to issue an 15:50:35  
6 opinion in your August 19th report but you were not 15:50:40  
7 asked to do so with respect to the infringement of the 15:50:44  
8 '138 patent, correct? 15:50:48

9 A. Correct. 15:50:49

10 MR. CHEN: Counsel, can we go off the 15:50:54  
11 record for a second? My real time has stopped 15:50:56  
12 working. 15:51:02

13 MR. OCZEK: That's fine. 15:51:05

14 THE VIDEOGRAPHER: We are going off the 15:51:06  
15 record. The time is 3:51 p.m. 15:51:08

16 (Recess.)

17 THE VIDEOGRAPHER: We are back on the 15:53:07  
18 record. The time is 3:52 p.m. 15:53:08

19 MR. OCZEK: I want to introduce one more 15:53:17  
20 exhibit, which will be Exhibit 19. 15:53:18

21 (Plaintiffs' Exhibit 19, Expert Report of 15:53:21  
22 Dr. Jonathan Wood, Exhibit E, was marked for  
23 identification.) 15:53:22

24 MR. SWAIN: It should be in the chat. 15:53:22

25 BY MR. OCZEK:

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1 Q. This is -- this is Exhibit E to Dr. Wood's 15:53:26  
2 report on the '577. 15:53:31

3 A. Okay. I have the report up -- the exhibit up. 15:55:19  
4 Sorry. 15:55:23

5 Q. Okay. So you've had an opportunity to scroll 15:55:23  
6 through this exhibit? 15:55:25

7 A. Yes. 15:55:25

8 Q. Have you seen this document before? 15:55:26

9 A. There are more pictures in here that I 15:55:27  
10 recognize, but that's not enough to let me be able to 15:55:38  
11 say for sure whether or not I've seen this exhibit. 15:55:46

12 Q. Okay. I'll represent to you, sir, that this 15:55:51  
13 Exhibit E to Dr. Wood's report, which is Exhibit 19 for 15:55:56  
14 today's deposition, this is Dr. Wood's infringement 15:56:02  
15 claim charts for the '577 Patent, the asserted claims of 15:56:08  
16 that patent. Okay? 15:56:14

17 A. Okay. 15:56:15

18 Q. And this document is -- this document is 128 -- 15:56:16  
19 sorry. Strike that. 15:56:51

20 It's 125 pages long, and in this document 15:56:53  
21 Dr. Wood goes in detail with respect to each element of 15:57:03  
22 each asserted claim of the '577 with respect to the 15:57:13  
23 defendants' Accused Products. And my question to you, 15:57:20  
24 sir, is, you don't have any opinions to rebut Dr. Wood's 15:57:24  
25 element-by-element analysis that each of the asserted 15:57:30

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1	claims infringes or is infringed by the Accused Products	15:57:35
2	of the '577 Patent, correct?	15:57:42
3	A. Yes. I haven't formed an opinion on that.	15:57:51
4	Q. Okay. So, therefore, you have no opinions with	15:57:53
5	respect to this exhibit, correct?	15:57:56
6	A. Yes.	15:57:58
7	Q. "Yes," meaning correct?	15:58:00
8	A. "Yes," meaning I haven't formed any opinions.	15:58:04
9	Q. And as you sit here today, sir, you haven't	15:58:07
10	issued any opinions that rebut what Dr. Wood has set	15:58:11
11	forth in his Exhibit E, correct?	15:58:19
12	A. Correct.	15:58:22
13	Q. And you had the opportunity to do that in your	15:58:23
14	August 19th report but were not asked to do so, correct?	15:58:27
15	A. Correct.	15:58:31
16	Q. With respect to Dr. Zane's and Dr. Wood's	15:58:32
17	reports, both of them attached copies of their CVs to	15:58:44
18	the reports, just like you attached a copy of your CV to	15:58:49
19	your report. Do you recall looking at the CVs for	15:58:52
20	Dr. Zane and Dr. Wood?	15:58:57
21	A. I'm trying to remember if their CVs came along	15:59:00
22	with the reports in -- in terms of the -- the copies of	15:59:21
23	the report that I got. Because one of the reports --	15:59:26
24	and I'm not sure which one -- I thought I remembered	15:59:41
25	Googling or checking something on the -- with the	15:59:45

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1 supply voltage fluctuations. Do you agree with that, 17:39:25  
2 sir? 17:39:30

3 MR. CHEN: Objection. Asked and 17:39:30

4 answered. 17:39:31

5 THE WITNESS: Yes, I could see that 17:39:32

6 happening. 17:39:39

7 BY MR. OCZEK: 17:39:40

8 Q. Okay. And when he's talking about supply 17:39:40

9 voltage fluctuations, he's talking to -- about the 17:39:42

10 supply into the -- the PWM switch 52, right? So voltage 17:39:46

11 can go up, voltage can go down, and the output of what's 17:39:51

12 being emitted by the light -- the LEDs is it's going to 17:39:56

13 stay substantially or relatively constant, right? 17:40:00

14 That's what Timmermans is telling us, correct? 17:40:04

15 A. Yes. 17:40:08

16 Q. Sir, do you believe the disclosure of 17:40:11

17 Timmermans, as described and disclosed in 2001, teaches 17:40:31

18 one of ordinary skill in the art to build the circuitry 17:40:35

19 and LED tube that's set forth in the Timmermans patent? 17:40:48

20 MR. CHEN: Objection. 17:41:07

21 THE WITNESS: I'm sorry. One more time 17:41:12

22 on that. 17:41:13

23 BY MR. OCZEK: 17:41:14

24 Q. Sure. 17:41:15

25 Do you believe the disclosure of Timmermans, as 17:41:15

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1 described and disclosed in 2001, teaches one of ordinary 17:41:18  
2 skill in the art to build the power supply circuitry and 17:41:23  
3 LED tube that's set forth in the Timmermans patent? 17:41:31  
4 A. Minus the parts I'm objecting to, yes. 17:41:39  
5 Q. Is it your opinion, sir, that everything 17:41:49  
6 disclosed in Timmermans is not fully enabled to one of 17:42:19  
7 ordinary skill in the art as of the filing date in 2001? 17:42:25  
8 MR. CHEN: Objection. Calling for legal 17:42:31  
9 conclusion. 17:42:38  
10 THE WITNESS: Okay. I'm sorry. I'm 17:42:38  
11 rereading -- I may have misread something because 17:43:43  
12 I'm now not finding where it was looking like he 17:43:48  
13 was adjusting the intensity to compensate for 17:43:50  
14 variations in light output -- I mean variations in 17:43:55  
15 light output that occur due to supply voltage 17:44:01  
16 fluctuations. You can monitor that by monitoring 17:44:08  
17 the supply voltage. Ambient temperature requires 17:44:10  
18 other -- requires another sensor, and other such 17:44:14  
19 factors requires other such factors' sensors. 17:44:18  
20 And so that's kind of my problem to -- he 17:44:24  
21 can -- he discloses everything one of ordinary 17:44:31  
22 skill in the art would need to build his tube and 17:44:36  
23 his power supply and the -- the circuit. He 17:44:40  
24 doesn't disclose how to do the user input, and he 17:44:45  
25 certainly doesn't disclose how to use his 17:44:51

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1 circuit -- to put in components in his circuit to 17:44:54  
2 be able to compensate for temperature changes. 17:44:59  
3 So when you're saying does he -- just in 17:45:05  
4 what he discloses, does he disclose the ability for 17:45:09  
5 one of ordinary skill to be able to build his 17:45:13  
6 product -- build his -- his invention, yeah, I -- 17:45:17  
7 let me just quick check, but I don't believe 17:45:29  
8 there's any kind of temperature claim. 17:45:32  
9 Yeah, okay. He's not listing a 17:46:12  
10 temperature claim on that, so, yes. Sorry. Long 17:46:14  
11 time to get to that, but... 17:46:18  
12 BY MR. OCZEK: 17:46:20  
13 Q. Would you agree it would be possible to regulate 17:46:22  
14 the intensity of light in res- -- in response to voltage 17:46:25  
15 and temperature fluctuations by monitoring the current 17:46:31  
16 drawn by the LED? 17:46:36  
17 MR. CHEN: Objection. Lack of 17:46:45  
18 foundation. 17:46:47  
19 THE WITNESS: What was your first one, to 17:46:47  
20 monitor the... 17:46:49  
21 BY MR. OCZEK: 17:46:53  
22 Q. Let me ask it again. 17:46:54  
23 Would you agree it would be possible to regulate 17:46:55  
24 the intensity of light in response to voltage and 17:46:58  
25 temperature fluctuations by monitoring the current drawn 17:47:01

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1           but there's no description of what to do or how to           18:11:56  
2           do it.   18:12:00  
3 BY MR. OCZEK:   18:12:06  
4 Q.        Sir, is it your opinion that the disclosure of           18:12:06  
5 Timmermans as of 2001 was not fully enabled to one of           18:12:09  
6 ordinary skill in the art?   18:12:19  
7            MR. CHEN: Objection. Calling for legal                   18:12:21  
8            conclusion. Mischaracterizes witness prior                   18:12:25  
9            testimony.   18:12:27  
10           THE WITNESS: It -- it's missing those                   18:12:28  
11           two pieces. It's missing the -- his part 3 or           18:12:40  
12           whatever that was, the option 3, and it's missing           18:12:46  
13           the user inner put -- user input in terms of           18:12:50  
14           teaching you how to achieve this -- this device.    18:12:58  
15 BY MR. OCZEK:   18:13:03  
16 Q.        Would a person of ordinary skill in the art in           18:13:04  
17 2001 know how to provide the user input?                   18:13:06  
18 A.       I would say no simply because when I'd be           18:13:17  
19 meeting there with the folks in Michigan in 2009 and           18:13:29  
20 '10, they were still struggling with fluorescent           18:13:39  
21 replacement tubes, and -- and the meetings that I was           18:13:43  
22 at, there were no discussions regarding any kind of user           18:13:47  
23 inputs. They were still working on how do you actually    18:13:52  
24 get a bulb that you can turn around and replace a           18:13:55  
25 fluorescent tube with.   18:14:01

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1	So I don't -- and the reason -- particularly on	18:14:03
2	the user interface, it may -- it might be relatively	18:14:06
3	easy to do it from an electronics point of view, but	18:14:11
4	from the point of view of the -- how do you do it, where	18:14:19
5	do you put it, how do you allow the person to access	18:14:22
6	it -- again, it's a fluorescent tube, it's up in the	18:14:25
7	ceiling -- I don't think somebody of ordinary skill in	18:14:28
8	the art would know that, because how many people of	18:14:34
9	ordinary skill in the art are trying to make adjustments	18:14:37
10	on a -- or trying to turn off switch -- like fluorescent	18:14:40
11	switches just to turn it on and off, if it's up in the	18:14:43
12	ceiling?	18:14:47
13	So to me, that's a major, major thing that the	18:14:50
14	lighting industry has struggled with for a while, and	18:14:55
15	certainly was struggling with it at this point.	18:15:01
16	Q. Eight years after the filing of Timmermans?	18:15:06
17	A. Yes.	18:15:10
18	Q. So is it your opinion, sir, that the entire	18:15:11
19	disclosure of Timmermans was not fully enabled as of the	18:15:18
20	filing date in 2001?	18:15:26
21	MR. CHEN: Objection. Asked and	18:15:30
22	answered. Calling for legal conclusions.	18:15:32
23	Mischaracterizing witness prior testimony.	18:15:35
24	BY MR. OCZEK:	18:15:40
25	Q. Sir?	18:15:41

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1	Q.	Sure. Let me ask it again.	18:55:38
2	A.	Okay.	18:55:40
3	Q.	Would a person of ordinary skill in the art know	18:55:40
4		how to make or use the invention of Timmermans from the	18:55:46
5		disclosure in the patent, coupled with information known	18:55:53
6		in the art, without undue experimentation?	18:55:58
7		MR. CHEN: Objection. Form.	18:56:10
8		THE WITNESS: Well, I said before	18:56:11
9		Timmermans doesn't totally disclose everything that	18:56:13
10		he has in his patent back to the user input. So	18:56:17
11		someone of ordinary skill in the art would not be	18:56:26
12		able to -- be able to use, without major	18:56:29
13		experimentation, I believe, to try to start putting	18:56:38
14		that user input. If you want to -- if that's	18:56:42
15		dropped out and the temperature feedback is dropped	18:56:47
16		out, my answer would be yes.	18:56:51
17	BY MR. OCZEK:		18:56:55
18	Q.	Are those all the aspects that you believe are	18:56:57
19		not disclosed in Timmermans, coupled with information	18:57:01
20		known in the art, without undue experimentation?	18:57:11
21		MR. CHEN: Objection. Form.	18:57:16
22		THE WITNESS: To produce the -- the --	18:57:18
23		the fluorescent replacement tube that Timmermans	18:57:23
24		dis- -- discloses the -- what he's invented.	18:57:29
25	BY MR. OCZEK:		18:57:38

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1 Q. So would a person of ordinary skill in the art 18:57:49  
2 know how to make or use the entire invention of 18:57:52  
3 Timmermans from the disclosures in the patent, coupled 18:57:57  
4 with information known in the art, without undue 18:58:03  
5 experimentation? 18:58:06

6 MR. CHEN: Objection to form. Asked and 18:58:09  
7 answered. 18:58:11

8 THE WITNESS: No, because the user input, 18:58:13  
9 there's no information on that. 18:58:17

10 BY MR. OCZEK: 18:58:22

11 Q. Okay, sir, that's all for today. 18:58:28

12 A. Thank you. 18:58:31

13 MR. CHEN: Okay. How much time do we 18:58:34  
14 have on the record? 18:58:36

15 THE VIDEOGRAPHER: Let's take us off the 18:58:37  
16 record real quick. 18:58:38

17 We're going off the record, and the time 18:58:40  
18 is 6:58 p.m. 18:58:42

19 (Volume II was concluded at 6:58 p.m.)

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